

**LAGOMARSINO LAW**

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1           **LAGOMARSINO LAW**  
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8           *Attorney for Plaintiff Steven Trang*

9  
10           **UNITED STATES DISTRICT COURT**

11           **DISTRICT OF NEVADA**

12           STEVEN TRANG, an individual,

13           Plaintiff,

14           vs.

15           BANK OF GEORGE, a Domestic  
16           Corporation; and T. RYAN SULLIVAN in  
17           his individual and professional capacity,

18           Defendants.

19           Case No.: 2:17-cv-00162-APG-EJY

20  
21           **STIPULATION AND [PROPOSED]**  
22           **ORDER TO EXTEND DEADLINE FOR**  
23           **COUNTERDEFENDANT TO FILE A REPLY**  
24           **BRIEF TO COUNTERCLAIMANT'S**  
25           **OPPOSITION TO COUNTERDEFENDANT'S**  
26           **SPECIAL MOTION TO DISMISS**

27           **(First Request)**

28           Pursuant to LR IA 6-1, 6-2, Plaintiff/Counterdefendant STEVEN TRANG, by and through his attorney of record, Andre Lagomarsino, Esq. of Lagomarsino Law and Defendants/Counterclaimants BANK OF GEORGE and T. RYAN SULLIVAN by and through their attorney of record, Richard I. Dreitzer, Esq. of the law firm of Fennemore Craig, P.C. hereby stipulate to extend the deadline for Counterdefendant to file a Reply to Counterclaimant's Opposition to Counterdefendant's Special Motion to Dismiss (ECF No. 61). Counterdefendant filed his Special Motion to Dismiss

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1 Counterclaimant's Counterclaim (ECF No. 55) on April 19, 2021. Pursuant to stipulation,  
2 Counterclaimant filed its Opposition to Counterdefendant's Special Motion to Dismiss on May 31,  
3 2021. (ECF No. 61). **The Reply brief is currently due June 8, 2021.**

4 This is the first request for an extension to file a Reply brief.

5 The reason for the extension is that Counterdefendant's counsel has only one (1) attorney  
6 currently on the case and that attorney was briefing three (3) other voluminous briefs in two (2)  
7 different cases during the time that was allotted to file a Reply brief in this case. The undersigned  
8 counsel (the aforementioned attorney) worked all three (3) days of the Memorial Day weekend and  
9 all of the following week in an effort to get caught up to the Reply brief but was unsuccessful.

10  
11 The following week, the Counterdefendant's counsel and the other attorney in his firm will be  
12 in depositions and preparing for depositions in other important and large damage matters and will be  
13 precluded from devoting adequate time to the Reply brief. While the undersigned has enlisted a law  
14 clerk to assist, counsel will still need time to review, research, edit and finalize the Reply brief so that  
15 it is of the quality that is expected in United States District Court.  
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1           **The parties agree, subject to the Court's approval, that the new deadline to file a Reply**  
2           **brief will be June 22, 2021.** The requested extension is sought in good faith and not for purposes of  
3           undue delay.  
4

5           **IT IS SO STIPULATED.**

6           DATED: this 4<sup>th</sup> day of June, 2021.  
7

8           **FENNEMORE CRAIG, P.C.**

9           By: /s/ Richard I. Dreitzer  
10           RICHARD I. DREITZER, ESQ.  
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16           *Attorneys for Defendants/Counterclaimants BANK OF GEORGE and SULLIVAN*

17           Dated this 4<sup>th</sup> day of June, 2021.

18           **LAGOMARSINO LAW FIRM**

19           By: /s/ Andre M. Lagomarsino  
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26           *Attorneys for Plaintiff/Counterdefendant TRANG*

27           **IT IS SO ORDERED.**

28           By: Eaynay J. Zouchah  
29           UNITED STATES MAGISTRATE JUDGE

30           Dated: June 7, 2021